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**DISCOVERY MATTER**

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19 KENO V. THOMAS

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

20 KENO V. THOMAS,

21 Plaintiff,

22 v.

23 STARZ ENTERTAINMENT, LLC;  
24 MICHAEL THORNTON; and DOES 1  
25 through 10, inclusive,

26 Defendants.

27 Case No.: CV15-09239 CAS (AFMx)

28 [Assigned to the Honorable Christina A.  
Snyder – Courtroom 8D]

**NOTICE OF MOTION RE JOINT  
DISCOVERY STIPULATION  
COMPELLING PRODUCTION OF  
DOCUMENTS OR, IN THE  
ALTERNATIVE, FOR PROTECTIVE  
ORDER**

Date: April 4, 2017  
Time: 10:00 a.m.  
Crtrm: H

**MATTER FOR DETERMINATION BY  
THE HONORABLE ALEXANDER F.  
MACKINNON**

Complaint filed: October 29, 2015  
Discovery Cut-Off: August 29, 2017  
Motion Cut-Off: November 10, 2017  
Trial Date: March 6, 2018

**PLEASE TAKE NOTICE** that on April 4, 2017, at 10:00 a.m., or as soon thereafter as counsel may be heard in Courtroom H, 9th floor of the United States District Court, Central District, located at 312 North Spring Street, Los Angeles, California 90012, Plaintiff Keno V. Thomas, will and hereby does move this Court for an order compelling production of documents or, in the alternative, use of a protective order appropriate to this case.

This motion is made following efforts by Plaintiffs' counsel to resolve these issues informally, as required by Local Rule 37-1, *et seq.* See Declaration of Brian Olney ("Olney Decl."), ¶¶ 2-13, filed concurrently herewith.

This motion is and will be based upon this Notice of Motion; the Joint Stipulation of Counsel, and exhibits; the pleadings and records on file with this court; the Declaration of Brian Olney; any evidence of which the Court may take judicial notice prior to or at the hearing of this matter; and upon such oral or documentary evidence as may be presented at the hearing of this motion.

Dated: March 13, 2017

Respectfully Submitted,

ROBERT D. NEWMAN, ATTORNEY AT LAW  
HADSELL STORMER & RENICK LLP

By: /s/ - Brian Olney

Dan Stormer

Cindy Pánuco

Brian Olney

Attorneys for Plaintiff